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Subject: EGRPRA Regulatory Burden

The following points are being made in response to the request for comments on Consumer Protection and Account/Deposit Relationships:

-Consumer Protection in Sales of Insurance – This merely creates additional paperwork and does not serve to inform the public in any way. Because there are so many numerous disclosures required with consumer lending, this additional disclosure just adds to the paperwork burden. In trying to protect the consumer, they are paradoxically confused by the barrage of disclosures which have no real meaning to the average consumer.

-Privacy of Consumer Financial Information – The annual privacy disclosure is routinely discarded by many consumers. Consumers receive numerous privacy statements from various companies which are ignored because each privacy statement says virtually the same thing. Another example of regulatory overkill.

-Disclosures required by the EFT and Truth in Savings regs are too lengthy and most likely are not read by the consumer.

In general, I feel that too much emphasis is placed on required policies for banks. I run an 18 million dollar bank and have three employees. At our last FDIC exam, the examiners stated that we were doing what was required in the areas of BSA and Safeguarding Customer Information, however we needed to better document what we are doing in policies. Perhaps small banks should be exempt from some of these policy requirements in an attempt to lessen the burden – particularly when we are doing what is required on a day to day basis.

I strongly feel that small banks are unduly burdened by regulatory requirements and exemptions for well-run small banks should be implemented. The insurmountable task of trying to comply with the myriad of rules and regs is threatening the survival of small banks in this country.

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